

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

|                                   |   |                                    |
|-----------------------------------|---|------------------------------------|
| <b>AVESHKA, INC.</b>              | ) |                                    |
|                                   | ) |                                    |
| <b>Plaintiff,</b>                 | ) |                                    |
|                                   | ) |                                    |
| <b>vs.</b>                        | ) | <b>Civil Action No. 1:14cv1006</b> |
|                                   | ) | <b>GBL/IDD</b>                     |
| <b>GLOBAL RECORD SYSTEMS, LLC</b> | ) |                                    |
|                                   | ) |                                    |
| <b>Defendant.</b>                 | ) |                                    |

**PLAINTIFF’S MOTION TO COMPEL AND IMPOSE SANCTIONS**

COMES NOW the Plaintiff, Aveshka, Inc. (“Aveshka”), by counsel, and respectfully requests this Honorable Court to compel the Defendant, Global Record Systems, LLC (“GRS”), to comply with this Court’s Order entered December 16, 2014, and to impose appropriate sanctions against GRS for its non-compliance. The basis for this Motion is set forth in the accompanying *Memorandum in Support of Plaintiff’s Motion to Compel and Impose Sanctions*, which is incorporated herein by this reference.

Respectfully submitted,  
Aveshka, Inc.  
By Counsel

\_\_\_\_\_/s/\_\_\_\_\_  
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\_\_\_\_\_/s/\_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 1<sup>st</sup> day of May, 2015, I will electronically file the foregoing Motion to Compel and Impose Sanctions with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following counsel for the Defendant, Global Record Systems, LLC:

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/s/

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